

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Deloris Phillips, Petitioner/Appellant,

And

Civil Cause No. 3:18-CV-03298-C-BH

Porshala Phillips, Respondent/Appellee,

William Brent, Respondent/Appellee.

**PETITIONER'S NOTICE OF RELATED CASES AND MOTION TO
TRANSFER/CONSOLIDATE RELATED CASES**

Respectfully and humbly,

Deloris Phillips (Petitioner/Appellant)
Pro Se Petitioner
3101 Luxar Way
Dallas, Texas 75233-1363
Phone: (469) 671-8941
Email: delorisphillips360@aol.com
Date: 12.25.2018

PETITIONER HUMBLY BESEECHES APPOINTMENT OF COUNSEL AND HEARING

Petitioner files this notice of related cases in compliance with U.S. Code Title 28a, Rule 40.2 Related Cases.

(a) Directly Related Cases

(1) At the time a complaint is filed, the filing attorney (or pro se plaintiff) shall file and serve on all parties who have appeared a Notice of Directly Related Case(s). Cases are deemed directly related when an earlier-filed case and the action being filed.

(A) involve the same parties and are based on the same or similar claims; or

(B) involve the same contract, property or patent.

(2) Where a Notice of Directly Related Case(s) is filed along with a new complaint, the clerk shall assign the cases to the judge to whom the earliest-filed directly related case is assigned. If the judge to whom the related case is assigned determines that the case in question is not in fact directly related, the judge will not return the case to the clerk for random assignment.

(3) Where the existence of directly related cases becomes apparent only after initial assignment, the Notice of Directly Related Case(s) shall be filed in all related cases, captioned in the name of the earliest-filed case. The notice may be accompanied by a motion to transfer and suggestion for consolidation under RCFC 42.1. The assigned judge in the earliest-filed case, after consultation with the judge in the later-filed case, will grant or deny the motion to transfer.

(4) Content of the Notice of Directly Related Case(s). The notice shall contain the title and case number of the related case, a brief statement of the relationship of the actions according to the criteria set forth in subdivision (a), and a statement addressing whether assignment to a single judge or other action, including consolidation, is or is not likely to conserve judicial resources and promote an efficient determination of the actions.

(b) Indirectly Related Cases.

(1) Whenever it appears to a party that there are two or more cases before the court that present common issues of fact and that transfer, consolidation, or the adoption of a coordinated discovery schedule would significantly promote the efficient administration of justice, the party may file a Notice of Indirectly Related Case(s). The notice shall be captioned in the name of the earliest-filed case. Solely for purposes of the filing the notice, counsel may appear in an earlier-filed case.

(2) The notice shall list the name and docket number of all indirectly related cases and shall detail the reasons supporting the proposed action. Counsel shall serve all parties in the related

cases. The clerk shall file the notice in those cases and furnish a courtesy copy of the notice to the chief judge. Solely for the purpose of responding to the notice, counsel in the related cases may appear in the earliest-filed case to file a response to the notice. The response shall be filed within 21 days after the service and captioned in the name of the earliest-filed case. Responses shall be served on counsel in all cases. The clerk shall file copies of the responses in each of the cases and shall furnish courtesy copies to the other judge.

(3) The assigned judge of the earliest-filed case shall call a meeting of all the assigned judges to determine what, if any, action is appropriate. The parties to each action shall be notified of any resulting decision.

Related Cases:

- 1) **DF-18-00541** (303rd) Dallas County District Court: Deloris Phillips vs. Phillips, Brent SACPR (filed 01.09.2018). Assigned to Honorable District Judge Dennise Garcia (303rd)/Associate Judge Graciela Olvera. Associate Judge Honorable G. Olvera abruptly filed Order of Recusal immediately after hearing on 03.22.2018 and Honorable Mary Murphy, Presiding Judge, First Administrative Judicial Region granted recusal and ordered transfer of DF-18-00541 (303rd) to 254th on 03.23.2018);

303RD PRETRIAL HEARING 01.24.2018 BEFORE HON. DISTRICT JUDGE D. GARCIA

- a) **ORDER** granting in part and denying in part petitioner's request for assistance with school records (Order Hon. Garcia 01.24.2018). No court reporter instructed to record/report hearing;
- b) **ORDER** denying petitioner Deloris Phillips' motion to have all hearings before the District Judge (Order Hon. Garcia 01.24.2018). No court reporter instructed to record/report hearing;
- c) **ORDER** granting petitioner Deloris Phillips motion to record all hearings/matters with personal recorder before Honorable Associate Judge Graciela Olvera (Order Hon. Garcia 01.24.2018). No court reporter instructed to record/report hearing;
- d) **ORDER** granting motion to confer with children on the record for the record (Order Hon. Garcia 01.24.2018). No court reporter instructed to record/report hearing;

303RD HEARING 03.01.2018 BEFORE HON. ASSOCIATE JUDGE G. OLVERA

- a) **ORDER** denying Petitioner's motion to grant permission to correct grandson's birth certificate (Order Hon. Associate Judge Olvera 03.01.2018). Petitioner recorded audio of hearing tape recorder and cassette.
- b) **ORDER** granting GPISD Motion to Quash. (Order Hon. Associate Judge Olvera 03.01.2018). **ORDER appealed.** Petitioner recorded audio of hearing tape recorder and cassette.

303RD HEARING 03.12.2018 BEFORE HON. DISTRICT JUDGE D. GARCIA

- a) **PRETRIAL ORDER** for all parties. (Order Hon. Garcia 03.12.2018). Petitioner did not attend this hearing. Petitioner was sitting in front of Hon. Associate Judge Olvera Court because petitioner was told all matters would be presided by Associate Judge with the exception of kids being heard on the record for the record by Hon. District Judge Garcia after final trial. Dallas City Attorney Charles Estee spoke under sworn oath on behalf of Mayor Rawlings, et al who were subpoenaed to testify and spoke untruths to the court. No court reporter instructed to record/report hearing;
- b) **ORDER** granting City of Dallas' Objections, Emergency Motion to Quash, and Motion for Protective Order for Mayor Rawlings, et al. (Order Hon. Garcia 03.12.2018). Petitioner did not attend this hearing. Petitioner was sitting in front of Hon. Associate Judge Olvera Court because petitioner was told all matters would be presided by Associate Judge with the exception of kids being heard on the record for the record by Hon. District Judge Garcia after final trial. Dallas City Attorney Charles Estee spoke under sworn oath on behalf of Mayor Rawlings, et al who were subpoenaed to testify and spoke untruths to the court. No court reporter instructed to record/report hearing. **ORDER APPEALED;**

303RD HEARING 03.22.2018 BEFORE HON. ASSOCIATE JUDGE G. OLVERA

- a) **ORDER** granting City of Dallas' Second Emergency Motion to Quash, and Motion for Protective Order for Mayor Rawlings, et al. (Order Associate Judge Hon. Olvera 03.22.2018). Petitioner recorded audio of hearing tape recorder and cassette;

- b) **VOLUNTARY ORDER OF RECUSAL** (Voluntary Order of Recusal Associate Judge Hon. Olvera 03.22.2018). This recusal was not discussed during hearing. Petitioner read of recusal while referencing Docket sheet at Dallas County website;
 - c) **ORDER TRANSFERRING** 303RD TO 254TH Honorable District Judge Darlene Ewing. Case transferred 03.23.2018 by Presiding Judge, First Administrative Judicial Region Hon. Mary Murphy (Order Transferring 03.23.2018);
- 2) **DF-18-00541** (254th) Dallas County District Court: *Deloris Phillips vs. Phillips, Brent* transferred from 303rd on 03.23.2018 to 254th to Honorable District Judge Darlene Ewing.

254th HEARING 04.09.2018 BEFORE HON. DISTRICT JUDGE D. EWING

- a) **ORDER** granting petitioner's motion for her to preside over any/all matters of the case. All hearings and motions were heard on the record for the record. (Order Hon. District Judge D. Ewing 04.09.2018);
- b) **ORDER** denying petitioner's motion/appeal to modify associate judge's order granting City of Dallas' Second Motion to Quash and Protective Order. All hearings and motions were heard on the record for the record. (Order Hon. District Judge D. Ewing 04.09.2018);
- c) **ORDER** denying petitioner's Order to dismiss with prejudice petitioner's appeal of Associate's Judges Hearing/Order (03.01.2018) denying petitioner's request to correct grandson's birth Certificate. Petitioner had corrected grandson's birth certificate prior to this hearing on 04.09.2018. All hearings and motions were heard on the record for the record. (Order Hon. District Judge D. Ewing 04.09.2018);
- d) **ORDER** denying (w/o prejudice) petitioner's motion for home study. All hearings and motions were heard on the record for the record. (Order Hon. District Judge D. Ewing 04.09.2018);
- e) **ORDER** denying petitioner's motion for appointment of counsel. All hearings and motions were heard on the record for the record. (Order Hon. District Judge D. Ewing 04.09.2018);

- f) **AMENDED SCHEDULING ORDER** for final trial date and instructions. No hearing was held (Order Hon. District Judge D. Ewing 04.20.2018). Order was read petitioner on Dallas County website;
- g) **ORDER APPOINTING AMICUS ATTORNEY/DALLAS COUNTY PUBLIC DEFENDER JENNIFER PERKINS** for the best interest of the children. Children were interviewed at petitioner's and respondent's home but never on record for the record by District Judge as Order granted. No hearing was held (Order Hon. District Judge D. Ewing 04.25.2018). Order was read petitioner on Dallas County website;

254th HEARING 06.04.2018 BEFORE HON. DISTRICT JUDGE D. EWING

- h) **ORDER** denying petitioner's motion for leave to file subpoena requesting production of documents and leave to file interrogatories for Mayor Rawlings, et al. All hearings and motions were heard on the record for the record.(Order Hon. District Judge D. Ewing 06.04.2018) **ORDER APPEALED;**
- i) **ORDER** denying motion for leave to subpoena testimony of Mayor Rawlings, et al and the notes of DPD Social Worker. All hearings and motions were heard on the record for the record.(Order Hon. District Judge D. Ewing 06.04.2018) **ORDER APPEALED;**
- j) **ORDER** withholding ruling until completion of trial on petitioner's motion to stay granted motion to conference with children on the record for the record. All hearings and motions were heard on the record for the record.(Order Hon. District Judge D. Ewing 06.04.2018). **ORDER APPEALED;**
- k) **ORDER** denying petitioner's motion for leave to subpoena children school records for 2017-18. All hearings and motions were heard on the record for the record. (Order Hon. District Judge D. Ewing 06.04.2018) **ORDER APPEALED;**

254th HEARING 07.13.2018 BEFORE HON. DISTRICT JUDGE D. EWING

- l) **ORDER** denying petitioner's motion to compel the release of Dallas Public Defender's Amicus Attorney's Investigatory Findings that concluded "General Denial" with the exception of any reports filed with the court which should be provided. All hearings and motions were heard on the record for the record.(Order Hon. District Judge D. Ewing 07.13.2018);

m) **ORDER RETURN OF CD'S.** Petitioner's Offer of Proof as rejected by Court.

No hearing was held regarding the Order to return CD's. This Order was prepared and handed to petitioner before hearing started on 07.13.2018. (Order Hon. District Judge D. Ewing 07.13.2018);

254th HEARING 08.22.2018 BEFORE HON. DISTRICT JUDGE D. EWING

n) **ORDER** granting Respondent's oral motion to dismiss ordering petitioner had lack of standing in spite of petitioner raising them from babies. **ORDER APPEALED.** All hearings and motions were heard on the record for the record.(Order Hon. District Judge D. Ewing 08.22.2018);

- 3) **05-18-00317-CV** Fifth Circuit Court of Appeals Dallas, Texas *Deloris Phillips vs. Phillips, Brent Appeals from DF-18-00541 (303rd & 254th):*
- 4) **05-18-00543-CV** Fifth Circuit Court of Appeals Dallas, Texas *Deloris Phillips vs. Phillips, Brent Appeals from DF-18-00541 (303rd & 254th):*
- 5) **05-18-00659-CV** Fifth Circuit Court of Appeals Dallas, Texas *Deloris Phillips vs. Phillips, Brent Appeals from DF-18-00541(303rd & 254th):*
- 6) **3:18-CV-01830-G-BT** The United States District Court Northern District of Texas (Dallas) *Deloris Phillips vs. Phillips, Brent Appeals from* Fifth Circuit Court of Appeals Dallas, Texas 05-18-00317-CV
- 7) **3:18-CV-02379-L-BK** The United States District Court Northern District of Texas (Dallas) *Deloris Phillips vs. Phillips, Brent Notice of Removal for DF-18-00541* from Dallas County District Court 254th.
- 8) **3:18-CV-02487-G-BT** The United States District Court Northern District of Texas (Dallas) *Deloris Phillips vs. Phillips, Brent* petitioner complaint and motion to compel DF-18-00541 303rd & 254th, and Fifth Circuit Court of Appeals Dallas, Texas transfer each case (05-18-00317-CV/05-18-00543-CV/05-18-00659-CV in its entirety.
- 9) **3:18-CV-02662-L-BT** The United States District Court Northern District of Texas (Dallas) *Deloris Phillips vs. Phillips, Brent* Appeal of mandate to reverse & Remand Judgment Remanding City of Dallas and Dallas Police Department and Motion Instructions for Motion for Leave. Appeal from 05-18-00659-CV.

- 10) **3:18-CV-03298-C-BH** The United States District Court Northern District of Texas (Dallas) *Deloris Phillips vs. Texas Department of Family and Protective Services FOIPA and USCIS FOIPA*.
- 11) **18-11425** The United States Court of Appeals for the Fifth Circuit *Deloris Phillips vs. Phillips, Brent* Appeal from 3:18-CV-01830-G-BT.
- 12) **18-11426** The United States Court of Appeals for the Fifth Circuit *Deloris Phillips vs. Phillips, Brent* Appeal from 3:18-CV-02379-L-BK.
- 13) **18-11428** The United States Court of Appeals for the Fifth Circuit *Deloris Phillips vs. Phillips, Brent* Appeal from 3:18-CV-02487-G-BT.
- 14) **18-11430** The United States Court of Appeals for the Fifth Circuit *Deloris Phillips vs. Phillips, Brent* Appeal from 3:18-CV-02662-L-BT.

MOTION TO CONSOLIDATE/TRANSFER CASE

Petitioner Deloris Phillips asks the court to consolidate and transfer this case with Civil Action No. 3:18-CV-03298-C-BH, *Deloris Phillips vs. Texas Department of Family and Protective Service FOIPA and USCIS FOIPA* with earliest-filed case and Justice/Judge Honorable A.J. Fish and Magistrate Judge Rebecca Rutherford (3:18-CV-01830-G-BT) and consolidate cases 3:18-CV-02379-L-BK, 3:18-CV-02487-G-BT and 3:18-CV-02662-L-BT the same. This notice of related cases and motion to consolidate/transfer is in compliance with U.S. Code Title 28a, Rule 40.2 Related Cases. Petitioner humbly requests clerk of the court to please give courtesy copies of this notice of related cases and motion to consolidate/transfer to each/any/all Justices/Judges involved so they may consider this motion to consolidate and transfer to Judge/justice of earliest-filed complaint of 3:18-CV-1830-G-BT.

1. A court may consolidate lawsuits if they involve substantially the same subject matter and if consolidation does not result in delay, jury confusion, or prejudice to the parties. Fed. R. Civ. P. 42(a); *Hendrix v. Raybestos-Manhattan, Inc.*, 776 F.2d 1492, 1495-96 (11th Cir. 1985). Each of these cases involve the connections and links of ongoing blacklisting, conspiracy to interfere with civil rights, and vindictive retaliation for petitioner's refusal to "open".

2. This suit and Civil Action No.3:18-cv-03298-C-BH are substantially the same because unbeknownst many parties involved have directly and/or indirectly partook in the most heinous conspiracy ever documented and witnessed and America's history and petitioner believe this to be irrefutably true. Petitioner is alleging discrimination as Jack Phillips and Master Piece Bakery (*Masterpiece Cakeshop, LTD., et al vs. Colorado Civil Rights Commission* 16-111) alleged violation of the First Amendment. In Jack Phillips new complaint *Masterpiece Cakeshop, LTD., et al vs. Colorado Civil Rights Commission* 1:18-CV-02074 he alleges he is being targeted for his religious belief and petitioner believe and allege she is being targeted because of her religious belief that "open" is at the least bisexuality and is totally against her innate beliefs. Petitioner believe there are three abominable sins: 1) suicide; 2) same-sex relation "open"; and 3) murder. Please see attachments to this email as my support alleging premeditated bias, discrimination, and conspiracy by your office to deprive a fair and honest investigation to the complaints I filed presently and in the past. Please see Jack Phillips new complaint and OCR responses and complaint attached separately as support. **Attachment 2:** Second and new complaint (58 pgs.) *Masterpiece Cakeshop, LTD., et al vs. Colorado Civil Rights Commission* 1:18-CV-02074. Please see Colorado Office of Civil Rights, et al Response (Motion to Dismiss) as **Attachment 3: Motion to Dismiss to Jack Phillips verified complaint** (29 pgs.) Petitioner is ready, willing and able to testify under sworn oath about it all as Jack Phillips, Kim Davis, Roy & Kayla Moore, Stormy Daniel, and Cedric Howard, Diane Ford, Abigail Fisher. Petitioner further allege the same accusations as *Roy Moore and Kayla Moore vs. Richard Hagedorn, et al.* (31-CV-2018-900346.00 Etowah County, Alabama). Roy and Kayla Moore are alleging, negligence, wantonness, defamation, negligent infliction of emotion distress, intentional infliction of emotional distress, outrage, and civil conspiracy. Please see **Attachment 4:** *Roy Moore and Kayla Moore vs. Richard Hagedorn, et al.* civil complaint (14 pgs.). Petitioner is beseeching court to read her First Amendment Protection and right to say "no", "infinity no" as a person, woman, human being, mother, sister, auntie, daughter, grandmother, minority, *poor person* (as defined by society) and being as a child of the most high and the Great Creator of the universe and with his infallible wisdom, I reiterate again my "infinity no" to "open". **Attachment 5:** First Amendment Protection (10 pgs.).

People seeking and searching for the complexity of conspiracies, corruption and cover-ups overlook the simplicity of it all. In cover-ups, corruption and conspiracies (civil and criminal) it involves the same people who the target interacts with on a daily and/or regular basis (i.e.: employees, friends, family, churches, schools, businesses, neighbors, stores, etc.) and unbeknownst to many of them they have no clue they are being exploited and used. In the case of whistleblowers it's in all reality their own superiors, neighbors, managers, supervisors, fellow co-workers, etc. (people they know) who retaliate against them and some or willing partakers.

3. In humblest humility petitioner is referencing Fisher I (*Abigail Fisher vs. University of Texas at Austin* 11-345) and Fisher II (*Abigail Fisher vs. University of Texas at Austin* 14-981) as support that petitioner believes that her duly filed complaints and appeals was never ever heard not once in Court but petitioner believes it is documented that she and her family is subjected to the most heinous committed and documented hate crimes of the 21st century and this is solely due to the fact of petitioner being a minority and being denied White privilege for being a minority and any/all of these inhuman reasons are unconstitutional and unlawful.

4. The United States Court of Appeals for the Fifth Circuit has consolidated appeals 18-11425/3:18-cv-01830, 18-11426/3:18-cv-2379, 18-11428/3:18-cv-02487 and 18-11430/3:18-cv-02662 as one and the main case to reference for all is 18-11425. Petitioner is humbly beseeching said court to do the same and consolidate cases to avoid using unnecessary resources.

5. The court should consolidate this suit with Civil Action No. 3:18-CV-01830, 3:18-cv-2379, 3:18-cv-2487, 3:18-cv-02662 styled *Phillips vs. Phillips, Brent.*, for the reasons listed above and below.

- a. The suits involve a common party. *See Advey v. Celotex Corp.*, 962 F.2d 1177, 1181 (6th Cir. 1992). Mayor Rawlings, The City Attorney's Office, Dallas Police, et al knows and holds the truth to the most relentless, documented retaliation ever committed and witnessed; including exploitation of children, Public officials, Civil Servants, children, women, and men.
- b. The suits involve common issues of law. *Cantrell v. GAF Corp.*, 999 F.2d 1007, 1010-11 (6th Cir. 1993); *see Young v. City of Augusta*, 59 F.3d 1160, 1168-69 (11th Cir. 1995); *see Hendrix*, 776 F.2d at 1495-96. Each of these case connect an ongoing relentless trail of retaliation including premeditated official oppression, deprivation rights under color of law, blacklisting, blackmail, blackbaling, black-labeling,

harassment, sexual harassment, conspiracy to interfere with civil rights that infiltrated schools, libraries, public agencies/departments, public transportation, public restrooms, businesses, stores, and escalating to physical violence and it is documented. Petitioner knows it to be sadly, easily feasible and possible for conspiracy to be methodically orchestrated and executed as Roy and Kayla Moore alleges. Petitioner as a minority female has a documented memory and paper trail of the same.

- c. The suits involve common issues of fact. *Cantrell v. GAF Corp.*, 999 F.2d 1007, 1010-11 (6th Cir. 1993); *see Hendrix*, 776 F.2d at 1495-96. The issues of fact are petitioner was never heard not once in court and nor was petitioner/complainant duly filed cases of ongoing, obvious retaliation never ever fairly investigated at OCR. The common issues of fact is this is totally uncommon in America for nonminorities and/or the wealthy to not be heard in the Court of law and/or government agencies when complaining of being subjected to injustices, unlawful violations, civil rights/equal rights violations.
- d. Consolidation will eliminate any risk of prejudice or confusion. If such a risk exists, it is outweighed by the risk of inconsistent adjudication of common factual and legal issues. *Cantrell v. GAF Corp.*, 999 F.2d 1007, 1011 (6th Cir. 1993); *Hendrix*, 776 F.2d at 1495. From then to now it is documented in lower courts, higher courts, OCR, FBI, TWCCRD, EEOC, USDOJ and now USCIS of what happens when a minority duly complains of known injustices and now cover-ups within cover-ups.
- e. Consolidation will not result in an unfair advantage. *Cantrell v. GAF Corp.*, 999 F.2d 1007, 1011 (6th Cir. 1993). Consolidation will assist all parties and the court in observing, reviewing, analyzing and assessing the reality of *what, who, when, and how* ongoing, retaliation exist to persist. Consolidation will also assist in future justice for cases/parties of alleging retaliation, blacklisting, etc. for being a whistleblower of injustices. In the case of *James Holzrichter vs. Northrop* the Holzrichter family (including children) endured 17 ½ years of retaliation because James Holzrichter was a whistleblower representing the government. Please see separate attachments for support. **Attachment One:** Memorandum and Order 89-C-6111 (2 pgs.) *United States of America, ex rel. Rex A. Robinson, and James Holzrichter vs. Northrop Corporation* granting and denying in part plaintiff's request to amend complaint.
- f. Consolidation will conserve judicial resources. *Cantrell v. GAF Corp.*, 999 F.2d 1007, 1011 (6th Cir. 1993); *Hendrix*, 776 F.2d at 1495.
- g. Consolidation will resolve the suits in less time than trying them separately. *Hendrix*, 776 F.2d at 1497.

- h. Consolidation will reduce the expense of trying the suits separately. *Cantrell v. GAF Corp.*, 999 F.2d 1007, 1011 (6th Cir. 1993); *Hendrix*, 776 F.2d at 1495.

C. Conclusion

6. For the aforementioned reasons, Petitioner asks the court to consolidate Civil Action No. 3:18-cv-03298 with Civil Action Nos. 3:18-cv-1830 (Hon. A.J. Fish and Magistrate Judge R. Rutherford), 3:18-cv-2379, 3:18-cv-2487 and 3:18-cv-02662 and to order the court clerk to merge the suits into one case under Civil Action No. 3:18-cv-1830 and to give courtesy copies of this notice of related cases and motion to consolidate/transfer cases to all judges/justices in these civil causes.

Respectfully and humbly,

Deloris Phillips (Petitioner/Appellant)
Pro Se Petitioner
3101 Luxar Way
Dallas, Texas 75233-1363
Phone: (469) 671-8941
Email: delorisphillips360@aol.com
Date: 12.25.2018

CERTIFICATE OF CONFERENCE

Petitioner verifies she did not confer regarding this notice of removal.

/s/: Deloris Phillips
Pro Se Petitioner
3101 Luxar Way
Dallas, Texas 75233-1363
Phone: (469) 671-8941
Email: delorisphillips360@aol.com
Date: 12.25.2018

STATE OF TEXAS§
DALLAS COUNTY§

DECLARATION UNDER PENALTY OF PERJURY
SWORN UNDER 28 U.S.C. § 1746 IN SUPPORT OF
PETITIONER'S NOTICE OF RELATED CASES AND MOTION TO
TRANSFER/CONSOLIDATE RELATED CASES

My name is Deloris Phillips, my date birth is 03.20.1967, and my address is 3101 Luxar way, Dallas, Texas 75233-1363, USA. The last four of my social security number is 8896. I have personal knowledge of this case and any/all allegations truthfully stated herein. I declare under penalty perjury that the facts stated in this document are true and correct.

A written declaration under penalty of perjury can be used in place of an Affidavit. *Mansions in the Forest, L.P. v. Montgomery Cty.*, 365 S.W.3d 314, 316 (Tex.2012) and Tex. Civil Prac. & Rem. Code § 132.001.

EXECUTED on the 25th day of December 2018.

Respectfully and humbly submitted,

/s/: Deloris Phillips

Pro Se Petitioner

3101 Luxar Way

Dallas, Texas 75233-1363

Phone: (469) 671-8941

Email: delorisphillips360@aol.com

Date: 12.25.2018

CERTIFICATE OF SERVICE

Petitioner Deloris Phillips certifies that a true and correct copy of *PETITIONER'S NOTICE OF RELATED CASES AND MOTION TO TRANSFER/CONSOLIDATE RELATED CASES* to email addresses of the respondents listed below.

Texas Department of Family and protective Services FOIPA
Attn: Honorable DFPS Commissioner H.L. Whitman, Jr.
Records.Management@dfps.state.tx.us

USCIS National Records FOIPA
Attn.: Honorable Alan D. Huges
ogis@nara.gov

/s/: Deloris Phillips
Pro Se Petitioner
3101 Luxar Way
Dallas, Texas 75233-1363
Phone: (469) 671-8941
Email: delorisphillips360@aol.com
Date: 12.26.2018